

# EXHIBIT A

LYNN  
PINKER  
HURST &  
SCHWEGMANN

## LYNN PINKER HURST & SCHWEGMANN, L.L.P.

2100 Ross Avenue, Suite 2700  
Dallas, Texas 75201  
Phone: 214.981.3800  
[www.lynnlfp.com](http://www.lynnlfp.com)

Invoice # 20243162  
Date: 08/20/2024  
Due On: 09/19/2024

Kent Ries  
Law Office of Kent Ries  
P.O. Box 3100  
Austin, TX 79116

### (5707-00001) Ries: In Re McClain Farms, Inc.; In Re McClain Feed Yard, Inc.; and In Re 7M Cattle Feeders, Inc.

### In Re McClain Farms, Inc.; In Re McClain Feed Yard, Inc.; and In Re 7M Cattle Feeders, Inc.

Client Reference Number:

#### Services

Date	TK	Description	Hours	Total
07/12/2024	AD	Teams meeting with Messrs. Ries, Jobe and Rae regarding [REDACTED] [REDACTED]	1.40	\$630.00
07/15/2024	AD	Telephone conference with Mr. McClain regarding case background.	0.30	\$135.00
07/15/2024	AD	Email to Messrs. Jobe and Faulkner regarding [REDACTED]	0.10	\$45.00
07/16/2024	WG	File and document management (1.0); prepare index and electronic notebook for team discussion (1.3).	2.30	\$460.00
07/16/2024	AD	Telephone conference with Mr. Jobe regarding [REDACTED]	0.20	\$90.00
07/16/2024	AD	Review email from Mr. Jobe regarding Rabo discovery.	0.20	\$90.00
07/17/2024	WG	Prepare notebook for Mr. Dabdoub containing key documents for team discussion regarding strategy (1.0);	3.00	\$600.00

prepare notebook for Mr. Sode containing key documents for team discussion regarding strategy (1.0); prepare notebook for case file containing key documents for team discussion regarding strategy (1.0).					
07/18/2024	PCS	Case team strategy meeting regarding motion to compel for service on Rabobank (0.7).  Case synopsis discussion with Ms. Gillaspie regarding key issues, potential defendants, and documents (0.5).	1.20	\$420.00	
07/18/2024	AD	Telephone conference with Messrs. Rae and Jobe regarding cash tracing.	1.10	\$495.00	
07/18/2024	AD	Analysis of [REDACTED] documents.	0.50	\$225.00	
07/18/2024	AD	Analysis of [REDACTED] privilege issue.	0.50	\$225.00	
07/18/2024	WG	Extract files received from Lain Faulkner and maintain in case file (0.6); meet and confer with Mr. Sode regarding case (0.3); review and maintain attorney notes regarding case development received from Mr. Dabdoub (0.2).	1.10	\$220.00	
07/19/2024	WG	Review email from Hudson Jobe (0.2); prepare for meeting with Mr. Dabdoub to discuss document review and production (0.5); meeting regarding the above (0.3).	1.00	\$200.00	
07/19/2024	AD	Analysis of background documents.	1.00	\$450.00	
07/19/2024	AD	Telephone conference with Mr. Jobe regarding status.	0.20	\$90.00	
07/22/2024	PCS	Analyze documents and other materials transmitted from bankruptcy counsel to establish key facts and issues in matter in connection with motion to compel discovery from Rabo and Focus (4.1).  Begin drafting and revising motion to compel discovery from Rabo and Focus, specifically factual background and beginning of legal argument (2.7).	6.80	\$2,380.00	
07/22/2024	WG	Review email from Hudson Jobe regarding index and labeling documents, access and download all files in the various links, structure the documents (1.2); schedule call with Mr. Jobe to discuss index and documents (0.1); extensive analysis of recently received case files to determine document management and organization for the purpose of indexing and document preparation for upcoming productions, draft spreadsheet providing outline of folders, sub-folders and the contents for case development (5.9); prepare outline of questions for conference call with Mr. Jobe scheduled for tomorrow (0.5).	7.70	\$1,540.00	
07/22/2024	AD	Analysis of [REDACTED] issues.	0.50	\$225.00	
07/22/2024	AD	Teams meeting with Messrs. Ries, Jobe and Rae regarding case status and next steps.	1.00	\$450.00	

07/22/2024	AD	Exchange emails with Mr. Jobe regarding [REDACTED]	0.20	\$90.00
07/23/2024	PCS	Continue drafting and revising motion to compel, specifically legal arguments about privilege, undue burden, overbreadth, confidentiality, relevance, Bankruptcy Rule 2004, and generally applicable court rules (3.9).  Analyze legal authorities pertinent to foregoing objections for purpose of synthesizing briefing points (3.2).	7.30	\$2,555.00
		Email correspondence with case team regarding motion to compel (0.2).		
07/23/2024	WG	Prepare for meeting and revise outline of questions regarding indexing and document review, additional revisions to spreadsheet (1.1); conference call with Mr. Hudson and Mr. Dabdoub (1.0).	2.10	\$420.00
07/23/2024	AD	Attention to Rabo documents.	1.00	\$450.00
07/23/2024	AD	Conference with Mr. Jobe and Ms. Gillaspie regarding indexing and document management.	1.00	\$450.00
07/23/2024	AD	Review email from Mr. Jobe regarding protective order.	0.10	\$45.00
07/24/2024	WG	Perform further analysis of files outlined on the spreadsheet per discussion with team, identify duplicates, revise to exclude electronic documents and determine file size of documents to be reviewed for database (2.0); call with Lino Gonzalez at Pinnacle to confirm pricing for the calculated file size (0.2); email to Hudson Jobe providing details of the document review database and the updated spreadsheet (0.1).	2.30	\$460.00
07/24/2024	PCS	Finalize first draft of motion to compel and supporting appendix and circulate to case team for pre-circulation review (1.1).	1.10	\$385.00
07/24/2024	AD	Edit Motion to Compel Production of Documents from Rabo.	3.50	\$1,575.00
07/26/2024	WG	Review of Appendix in comparison with the brief to ensure ready for filing (0.2); review rules to determine response deadline and analyze for future filings (0.4).	0.60	\$120.00
07/26/2024	AD	Telephone conference with Mr. Jobe regarding motion to compel Rabo to produce documents.	0.20	\$90.00
07/26/2024	AD	Final review for filing of motion to compel Rabo to produce documents.	0.50	\$225.00
07/29/2024	WG	Follow-up email to Hudson Jobe regarding the document review platform.	0.10	\$20.00
07/30/2024	WG	Access court portal and add Mr. Sode and myself on the service list (0.2); call with Bankruptcy Division to ensure the above (0.2); begin downloading, reviewing and maintaining files received from Hudson Jobe in the case file (1.0);	1.60	\$320.00

review setting of hearing on Trustee's Motion to Compel and pull Judge Jones' Hearing Dates and Calendar for inclusion on the entry, revise calendar accordingly (0.2).

07/30/2024	AD	Telephone conference with Mr. Jobe regarding hearing on motion to compel Rabo.	0.10	\$45.00
07/30/2024	AD	Review Notice of Hearing on motion to compel Rabo.	0.10	\$45.00
07/31/2024	WG	Attention to email regarding re-noticing of hearing on Trustee's Motion to Compel, note accordingly on calendar (0.1); continue extensive analysis of files received from Mr. Jobe, identify corrupt files and re-download, determine file size of documents associated with Riley Livestock (2.0); call with Mr. Jobe (0.2).	2.50	\$500.00
07/31/2024	AD	Telephone conference with Mr. Jobe regarding status.	0.10	\$45.00
<b>Services Subtotal</b>			<b>\$16,810.00</b>	

### Expenses

Date	Description	Quantity	Price	Total
07/31/0024	Postage	1.00	\$11.70	\$11.70
07/31/0024	Westlaw research for Julu 2024.	1.00	\$1.22	\$1.22
<b>Expenses Subtotal</b>			<b>\$12.92</b>	

Time Keeper	Position	Hours	Rate	Total
Alan Dabdoub	Partner	13.8	\$450.00	\$6,210.00
Campbell Sode	Associate	16.4	\$350.00	\$5,740.00
Whitney Gillaspie	Paralegal	24.3	\$200.00	\$4,860.00
<b>Subtotal</b>			<b>\$16,822.92</b>	
<b>Total</b>			<b>\$16,822.92</b>	

### Detailed Statement of Account

#### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
20243592	10/19/2024	\$69,984.40	\$0.00	\$69,984.40

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20244063	11/14/2024	\$56,564.76	\$0.00	\$56,564.76
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**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
20243162	09/19/2024	\$16,822.92	\$0.00	\$16,822.92
Outstanding Balance				\$143,372.08
Total Amount Outstanding				\$143,372.08

Please make all amounts payable to: LYNN PINKER HURST & SCHWEGMANN, L.L.P.  
Tax ID 75-2507536

Please pay within 30 days.

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## LYNN PINKER HURST & SCHWEGMANN, L.L.P.

2100 Ross Avenue, Suite 2700  
Dallas, Texas 75201  
Phone: 214.981.3800  
[www.lynnllp.com](http://www.lynnllp.com)

Invoice # 20243592  
Date: 09/19/2024  
Due On: 10/19/2024

Kent Ries  
Law Office of Kent Ries  
P.O. Box 3100  
Austin, TX 79116

### (5707-00001) Ries: In Re McClain Farms, Inc.; In Re McClain Feed Yard, Inc.; and In Re 7M Cattle Feeders, Inc.

### In Re McClain Farms, Inc.; In Re McClain Feed Yard, Inc.; and In Re 7M Cattle Feeders, Inc.

Client Reference Number:

#### Services

Date	TK	Description	Hours	Total
08/01/2024	KER	Meet with Mses. Gillaspie, Lawrence, and Lopez to discuss search terms and case background for review of produced documents.	0.50	\$150.00
08/01/2024	WG	Prepare link containing zip files confirmed for review on DISCO (1.0); confer with Lino Gonzales at Pinnacle confirming pricing of the above (0.2); confer with Mr. Jobe regarding DISCO pricing (0.2); call with Mr. Jobe regarding [REDACTED] (0.5); analyze documents pertaining to [REDACTED] (0.4); meeting with Mr. Sode to discuss protocol and next steps in terms of document review (0.5); meeting with review team to establish game plan for document review (0.9);	3.90	\$780.00

review the Motion for Relief from Stay filed by Citizens Bank, add hearing details to the calendar, maintain filings in the case file (0.2).					
08/01/2024	ADL	Meet with Mses. Gillaspie, Rastegar and Lopez regarding upcoming document review.	0.50	\$150.00	
08/01/2024	PCS	Case team meeting with Ms. Gillaspie to strategize document review process for implementation by eDiscovery team.	0.40	\$140.00	
08/01/2024	MAL	Attend team meeting to discuss document review.	0.50	\$150.00	
08/02/2024	WG	Discuss database with Lino Gonzales at Pinnacle (0.3); quality check of link containing zip files confirmed for review on DISCO (0.5); email to Mr. Gonzales the above for ingest (0.1).	0.90	\$180.00	
08/02/2024	PCS	Begin analyzing legal authorities relevant to [REDACTED] claims to synthesize potential claims [REDACTED]	1.90	\$665.00	
08/04/2024	WG	Review motion and ensure deadlines calendared (0.4); perform quality check of link received from HJ containing various related bankruptcy cases and adversary proceedings, maintain in case file (0.8); analysis of documents and prepare outline, identify corrupted and missing files, perform transfer to case file ahead of revising Document Index (3.2).	4.40	\$880.00	
08/04/2024	AD	Attention to status and next steps.	0.20	\$90.00	
08/05/2024	WG	Review Trustee's Amended Notice of Hearing and revise the calendar accordingly, make note of dual hearings on both calendar entries (0.2); review and maintain attorney call notes regarding plan for assessing claims [REDACTED] (0.1); complete extensive analysis of documents, identify corrupted and missing files, download files received from client and transfer to case file ahead of revising Document Index (3.0).	3.30	\$660.00	
08/05/2024	PCS	Analyze legal authorities relevant to [REDACTED] [REDACTED] [REDACTED] (5.1).  Begin drafting and writing case overview and potential claims memo for circulation to document review team (3.7)	8.80	\$3,080.00	
08/05/2024	AD	Teams meeting with Messrs. Jobe and Rae regarding document review and analysis plan.	0.50	\$225.00	
08/05/2024	AD	Exchange emails with Mr. Jobe regarding hearing date on motion to compel Rabo.	0.20	\$90.00	
08/06/2024	PCS	Analyze legal authorities relevant to [REDACTED] [REDACTED] defendants (3.7).  Draft and revise comprehensive case overview and document	8.40	\$2,940.00	

		review memorandum to incorporate above claims (4.7).		
08/06/2024	WG	Perform comparison of documents reviewed with Mr. Ries's list and confirm documents on database, search for loan ledgers (0.9); analyze additional documents received from the client for chart revisions (1.2); draft chart listing all parties and counsel of record (2.2).	4.30	\$860.00
08/06/2024	ADL	Review and respond to correspondence from Ms. Gillaspie regarding document review; confer with Mses. Gillaspie and Lopez regarding document review.	0.30	\$90.00
08/06/2024	AD	Review emails from Mr. Cass regarding documents.	0.20	\$90.00
08/07/2024	PCS	Draft and revise comprehensive case overview, potential claims, and document review memorandum by adding additional arguments and legal authorities throughout (1.9).  Analyze legal authorities governing c [REDACTED] [REDACTED] [REDACTED] (2.4).	4.30	\$1,505.00
08/07/2024	WG	Review documents marked relevant [REDACTED] (2.8); email to Rick Cass and team with the above (0.2).	3.00	\$600.00
08/07/2024	ADL	Correspondence with Ms. Gillaspie regarding client research request; research database for requested loan documents.	1.80	\$540.00
08/07/2024	AD	Analysis of case memorandum.	0.50	\$225.00
08/07/2024	AD	Exchange emails with Mr. Jobe regarding status.	0.20	\$90.00
08/08/2024	WG	Call with Hudson Jobe confirming our team's review of Rabo's production and provide highlight excerpt of index (0.2); prepare Rabo's full production for ingest on to DISCO and confirm with review team (0.3); revise the Case Document Index to highlight documents currently under review (0.4); review and respond to the email from Rick Cass regarding Rabo documents, fo [REDACTED] Rick Cass for reference (0.2); organize and identify by bates ranges documents relevant to specified loan ledgers (0.9); prepare detailed email to Rick Cass providing the above (0.3); continue analyzing documents and revising the Master Index (4.4).	6.70	\$1,340.00
08/08/2024	ADL	Correspondence with Ms. Gillaspie regarding client research request; research loan documents in document database.	0.80	\$240.00
08/09/2024	PCS	Prepare for and participate in strategy and analysis conference call with Messrs. Dabdoub and Jobe (0.9).  Analyze legal authorities relevant to application [REDACTED] [REDACTED] [REDACTED] (2.2).	3.10	\$1,085.00

08/09/2024	AD	Teams call with Messrs. Jobe and Sode regarding potential claims.	0.50	\$225.00
08/11/2024	WG	Continue revising Master Index of case documents.	1.00	\$200.00
08/12/2024	WG	Call with Rick Cass regarding case documents and document review (0.5); draft detailed chart outlining documents on DISCO and on the Master Index (1.5); determine file size of all CFSB and Mechanics Bank statements via file conversion (0.8); review and respond to email from Hudson Jobe regarding review of bank statements (0.2); perform comparison of documents on OneDrive with what has been downloaded to ensure all files successfully transferred, identify errors and prepare bank statements from CFSB and Mechanics Bank for ingest to DISCO (1.9); continue revising the Master Index (0.5).	5.40	\$1,080.00
08/12/2024	AD	Edit claims memorandum.	0.50	\$225.00
08/13/2024	WG	Perform quality check of bank statements from CFSB and Mechanics Bank, email to Pinnacle for ingest (0.5); email to Rick Cass regarding the ingest and forwarding DISCO search manual (0.2); complete list of parties and counsel with excerpts based on importance, circulate to team for reference (1.1).	1.80	\$360.00
08/13/2024	PCS	Case team meeting to identify key defendants for focus during document review process (0.2).  Email correspondence with case team regarding document review issues and strategy (0.2).	0.40	\$140.00
08/14/2024	WG	Continue updates to the Master Index based on document review, begin extensive analysis of files received from Lain Faulkner to identify download errors in comparison with the links and files on OneDrive, determine empty folders and duplicates, revise the index accordingly (6.9); call with Rick Cass regarding DISCO database and document review (0.5); document discussions with Mr. Sode (0.4); meeting with team regarding status update of document review (0.5); review and respond to email from Mr. Jobe providing status update (0.1).	8.40	\$1,680.00
08/14/2024	PCS	Prepare for and participate in strategy meeting with case team regarding document review project management and next steps (1.4).  Analyze substantive information about potential legal claims [REDACTED] (1.9).	3.30	\$1,155.00
08/14/2024	AD	Meeting with team regarding document review and tagging.	0.50	\$225.00
08/14/2024	ADL	Meet with Messrs. Dabdoub and Sode and Ms. Gillaspie regarding	0.60	\$180.00

		discovery; confer with Mses. Lopez and Rastegar regarding discovery		
08/14/2024	FAF	Case strategy conference with Mr. Dabdoub regarding case matter, needs, and next steps.	0.80	\$280.00
08/15/2024	WG	Complete extensive analysis of files received from Lain Faulkner and revise the index, complete outline of Master Index.	5.20	\$1,040.00
08/15/2024	PCS	Analyze substantive legal authorities and briefing transmitted by co-counsel Hudson Jobe to identify key factual points and legal arguments for inclusion in comprehensive case overview memorandum (2.9).	7.40	\$2,590.00
		Draft and revise comprehensive case overview memorandum to include substantive information [REDACTED] [REDACTED] [REDACTED] (4.5)		
08/15/2024	ADL	Research terms as requested by Mr. Jobe.	0.20	\$60.00
08/16/2024	WG	Review spreadsheet of search hits (0.8); meet with S. Lawrence to discuss the above (0.2); evaluate documents identified by search hits, prepare link for Mr. Jobe's review (3.5); call with Mr. Jobe regarding the above (0.1).	4.60	\$920.00
08/16/2024	ADL	Confer with Ms. Gillaspie regarding search term request; research terms and review documents as requested by Mr. Jobe; create Excel sheet with search term results; database administration to organize document metadata and create search term folders; call with database administrator to discuss document metadata.	2.40	\$720.00
08/16/2024	AD	Exchange emails with Mr. Jobe regarding status.	0.20	\$90.00
08/17/2024	WG	Identify issues with Sharefile and create new link with easier access for Mr. Jobe (1.4); email to Mr. Jobe forwarding the same (0.1).	1.50	\$300.00
08/18/2024	WG	Review email from Rick Cass regarding the Canyon Rim files and Equipment Inventory list (0.3); review and maintain recent case filings (0.2); continue revising the Master Index and performing extensive review of data files and documents (2.7).	3.20	\$640.00
08/18/2024	AD	Attention to status and next steps.	0.20	\$90.00
08/19/2024	PCS	Finish reviewing and analyzing supplemental authorities circulated by co-counsel Hudson Jobe [REDACTED] [REDACTED] (2.3).	8.10	\$2,835.00
		Analyze legal authorities to ascertain requirements for [REDACTED] [REDACTED] [REDACTED] (3.6).		

Begin drafting and revising comprehensive case analysis and document review memo to reflect standing requirements likely to be [REDACTED]

(2.2).

08/19/2024	WG	Review and respond to email confirming Rabo documents received by subpoena (0.1); extensive review of index and documents to determine total of Rabo documents received in this matter thus far and prepare outline (1.4); continue revising the Master Index and performing extensive review of data files and documents (5.2).	6.70	\$1,340.00
08/19/2024	AD	Review and respond to emails from Rabo counsel regarding Motion to Compel.	0.50	\$225.00
08/19/2024	AD	Teams meeting with Mr. Jobe regarding status.	1.00	\$450.00
08/20/2024	WG	Revisions to the Outline of the Master Index to provide current status of the index to team (1.0); complete extensive analysis of documents and data files and finalize the Master Index (3.4); review and respond to Mr. Dabdoub confirming receipt of Rabo documents (0.2); email to Mr. Jobe attaching Master Index and the Outline in support of (0.1); call with Mr. Jobe regarding Rabo documents (0.1); prepare link containing all documents produced by Rabo in this matter, analyze documents and Master Index to locate all documents, confer with Mr. Sode to finalize origins of documents to ensure all are accounted for (1.5); call via Teams with Mr. Jobe to review and discuss Riley Livestock documents (0.4).	6.70	\$1,340.00
08/20/2024	PCS	Finish drafting and revising claim analysis memo to [REDACTED] [REDACTED] (3.7).	5.60	\$1,960.00
		Substantive email correspondence and discussions with case team regarding strategy issues and other case administration matters (1.2).		
		Analyze court order [REDACTED] (0.7).		
08/20/2024	ADL	Review and respond to correspondence from Ms. Gillaspie regarding document search request; confer with Mses. Rastegar and Lopez regarding discovery.	0.20	\$60.00
08/20/2024	AD	Exchange emails with Mr. Johnson regarding Motion to Compel Rabo.	0.30	\$135.00
08/20/2024	FAF	Review Case Analysis Memorandum; case strategy correspondence with Messrs. Dabdoub and Sode regarding same.	1.70	\$595.00
08/21/2024	PCS	Prepare for and participate in case team meeting with eDiscovery attorneys regarding next steps for review of Riley production (0.7).	3.70	\$1,295.00

Prepare for and participate in case team Zoom call with Messrs. Dabdoub, Jobe, and Rae regarding case strategy and factual development issues (1.2).					
Analyze Alabama legal authorities relevant to enforceability of limitations of liability and related legal issues (1.8)					
08/21/2024	WG	Team meeting to discuss review of Riley documents and establish plan.	0.50	\$100.00	
08/21/2024	KER	Meet with Mr. Sode and Mses. Gillaspie, Lawrence, and Lopez to discuss search terms and case background for review of produced documents (0.5); review of document review protocol memorandum and case pleadings (0.7).	1.20	\$360.00	
08/21/2024	AD	Analysis of Car Riggs documents.	0.50	\$225.00	
08/21/2024	AD	Meeting with Messrs. Rae and Jobe regarding Carr Riggs documents.	1.00	\$450.00	
08/21/2024	AD	Telephone conference with Mr. Jobe regarding case tasks.	0.50	\$225.00	
08/21/2024	ADL	Meet with Mses. Gillaspie, Lopez and Rastegar and Mr. Sode regarding discovery; review document review protocol memorandum and case background materials.	1.70	\$510.00	
08/22/2024	MAL	Team meeting to discuss search terms and document review.	0.50	\$150.00	
08/22/2024	PCS	Analyze legal authorities [REDACTED] (1.4).  Analyze legal authorities relevant to [REDACTED] (3.1).	4.50	\$1,575.00	
08/22/2024	ADL	Research terms in document database as requested by Mr. Jobe; create Excel sheet to record Bates numbers of search results.	4.40	\$1,320.00	
08/23/2024	PCS	Investigate interaction of [REDACTED] (2.5).  Substantive email correspondence with case team regarding [REDACTED] (1.4).	3.90	\$1,365.00	
08/23/2024	ADL	Research terms in document database as requested by Mr. Jobe; record Bates numbers of search results in an Excel sheet.	5.00	\$1,500.00	
08/25/2024	ADL	Research terms in document database as requested by Mr. Jobe; record Bates numbers of search results in an Excel sheet.	4.70	\$1,410.00	
08/25/2024	AD	Analysis of Rabo's Response to Motion to Compel.	0.50	\$225.00	
08/25/2024	AD	Attention to [REDACTED]	0.80	\$360.00	
08/25/2024	AD	Email to Mr. Jobe [REDACTED]	0.20	\$90.00	

08/25/2024	AD	Email to Mr. Ries regarding Rabo Opposition to Motion to Compel.	0.10	\$45.00
08/26/2024	PCS	Prepare for and participate in case strategy meeting regarding [REDACTED] (1.4).	5.50	\$1,925.00
Analyze arguments and authorities set out in Rabo opposition to Trustee motion to compel to confirm points for discussion in Reply brief, inclusive of argument outline (1.9).				
Analyze legal authorities to synthesize points of law that support arguments to be made in Reply brief in support of motion to compel (2.2).				
08/26/2024	ADL	Research terms in document database as requested by Mr. Jobe; record Bates numbers of search results in an Excel sheet.	6.40	\$1,920.00
08/26/2024	AD	Telephone conference with Hudson Jobe regarding claims.	0.20	\$90.00
08/26/2024	AD	Further review and analysis of [REDACTED] documents.	0.70	\$315.00
08/26/2024	AD	Exchange emails with Mr. Ries regarding Rabo motion to compel.	0.20	\$90.00
08/26/2024	AD	Meeting with Messrs. Rae, Ries and Jobe [REDACTED]	1.50	\$675.00
08/27/2024	PCS	Analyze legal authorities supporting [REDACTED] (3.3).	8.10	\$2,835.00
Begin drafting and revising Reply in support of motion to compel discovery from Rabo and Focus, specifically arguments about pending proceeding rule, facial overbreadth, and undue burden (4.8).				
08/27/2024	WG	Meeting to discuss Riley documents (0.5); document review to establish timeline of completion (0.5).	1.00	\$200.00
08/27/2024	ADL	Meet with Messrs. Jobe and Dabdoub and Ms. Gillaspie regarding discovery; review documents for search terms provided by Mr. Jobe; input search term Bates numbers into Excel sheet.	5.70	\$1,710.00
08/27/2024	AD	Telephone conference with Mr. Jobe and Ms. Gillaspie regarding documents.	0.50	\$225.00
08/27/2024	AD	Attention to reply in support of motion to compel Rabo.	0.20	\$90.00
08/28/2024	PCS	Analyze legal authorities pertinent [REDACTED] (0.7).	2.10	\$735.00
Finish drafting and revising first draft of Reply in support of motion to compel, specifically arguments about work product doctrine and waiver of privilege (1.4).				
08/28/2024	WG	Call with Rick Cass regarding document review, run searches and compare findings, discuss next steps if the documents were not produced (0.3); perform searches based on Mr. Cass's breakdown of documents	1.30	\$260.00

		received from CFSB and Mechanics Bank (0.9); confer with review team regarding the above (0.1).		
08/28/2024	ADL	Search for terms as requested by Mr. Jobe; compile search term results in Excel sheet; review and respond to correspondence from Ms. Gillaspie regarding bank document search request; search for bank documents; compile bank search term results in excel sheet.	6.20	\$1,860.00
08/28/2024	FAF	Review Rabo's Stipulation for Withdrawal of Objection to Rule 2004 Motion.	0.10	\$35.00
08/29/2024	PCS	Draft and revise Reply brief in support of motion to compel discovery from Rabo and Focus to incorporate substantive feedback from Mr. Dabdoub (1.1).	4.90	\$1,715.00
		Analyze legal authorities [REDACTED] [REDACTED] (2.9)		
		Incorporate additional authority on work product doctrine and client comments into Reply brief (0.9).		
08/29/2024	WG	Review spreadsheet and compare to CFSB Bank Request and Mechanics Bank Request (0.3); email to Rick Cass forwarding the above (0.1).	0.40	\$80.00
08/29/2024	ADL	Review and respond to correspondence from Ms. Gillaspie regarding discovery; search for terms as requested by Mr. Jobe; compile search term results in Excel sheet.	6.90	\$2,070.00
08/29/2024	AD	Edit reply brief in support of motion to compel Rabo.	1.00	\$450.00
08/30/2024	PCS	Finalize Reply in support of motion to compel Rabo and Focus by synthesizing feedback of Mr. Dabdoub dated August 30, 2024; finalize and file same (1.8).	1.80	\$630.00
08/30/2024	WG	Check on status of Riley spreadsheet, evaluate form (0.4); confer with Rick Cass regarding updated OneDrive link, check link per request and confirm accessibility (0.4); review email from Hudson Jobe [REDACTED] (0.1); analyze Riley spreadsheet and assemble documents identified by search hits [REDACTED] (1.0); respond to Mr. Jobe's email with preliminary assembly of documents (0.1); continue analyzing R [REDACTED] (3.4); prepare link containing additional documents pulled pertaining to the above and forward to Mr. Jobe for evaluation (0.5).	5.50	\$1,100.00
08/30/2024	AD	Finalize reply brief in support of motion to compel Rabo.	1.00	\$450.00
08/30/2024	ADL	Review and respond to correspondence from Ms. Gillaspie and Mr. Dabdoub regarding discovery; search for terms as requested by Mr. Jobe; compile search term results in Excel sheet.	2.70	\$810.00
08/31/2024	WG	Continue analyzing Riley spreadsheet and assembling documents	2.60	\$520.00

identified by search hits related to Grand Total Gross.

**Services Subtotal** \$69,980.00

### Expenses

Date	Description	Quantity	Price	Total
08/31/0024	In-house copy charges	44.00	\$0.10	\$4.40
<b>Expenses Subtotal</b>				<b>\$4.40</b>

Time Keeper	Position	Hours	Rate	Total
Alan Dabdoub	Partner	14.4	\$450.00	\$6,480.00
Farsheed Fozouni	Associate	2.6	\$350.00	\$910.00
A'Lys Lawrence	Attorney	50.5	\$300.00	\$15,150.00
Melissa Lopez	Associate	1.0	\$300.00	\$300.00
Katie Rastegar	Associate	1.7	\$300.00	\$510.00
Campbell Sode	Associate	86.2	\$350.00	\$30,170.00
Whitney Gillaspie	Paralegal	82.3	\$200.00	\$16,460.00
<b>Subtotal</b>				<b>\$69,984.40</b>
<b>Total</b>				<b>\$69,984.40</b>

### Detailed Statement of Account

#### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
20243162	09/19/2024	\$16,822.92	\$0.00	\$16,822.92

#### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
20243592	10/19/2024	\$69,984.40	\$0.00	\$69,984.40
<b>Outstanding Balance</b>				<b>\$86,807.32</b>
<b>Total Amount Outstanding</b>				<b>\$86,807.32</b>

Please make all amounts payable to: LYNN PINKER HURST & SCHWEGMANN, L.L.P.  
Tax ID 75-2507536

Please pay within 30 days.



## LYNN PINKER HURST & SCHWEGMANN, L.L.P.

2100 Ross Avenue, Suite 2700  
Dallas, Texas 75201  
Phone: 214.981.3800  
[www.lynnllp.com](http://www.lynnllp.com)

Invoice # 20244063  
Date: 10/15/2024  
Due On: 11/14/2024

Kent Ries  
Law Office of Kent Ries  
P.O. Box 3100  
Austin, TX 79116

### (5707-00001) Ries: In Re McClain Farms, Inc.; In Re McClain Feed Yard, Inc.; and In Re 7M Cattle Feeders, Inc.

### In Re McClain Farms, Inc.; In Re McClain Feed Yard, Inc.; and In Re 7M Cattle Feeders, Inc.

**Client Reference Number:**

#### Services

Date	TK	Description	Hours	Total
09/01/2024	WG	Continue analyzing Riley spreadsheet and assembling documents identified by search hits [REDACTED] (3.2); email to Mr. Jobe with status and updated link (0.1).	3.30	\$660.00
09/01/2024	AD	Attention to status and next steps.	0.20	\$90.00
09/03/2024	ADL	Review and respond to correspondence from Ms. Gillaspie regarding discovery; search for terms as requested by Mr. Jobe; compile search term results in Excel sheet.	4.00	\$1,200.00
09/03/2024	WG	Review Order setting hearing and add details to the calendar (0.2); maintain and review Doc 289 Supplement to Rabo and Focus's Objection and Opposition to Trustee's Motion to Compel (0.2).	0.40	\$80.00
09/03/2024	AD	Email to Mr. Rae regarding status.	0.10	\$45.00
09/03/2024	AD	Review email from counsel for Rabo regarding document	0.10	\$45.00

		production.		
09/04/2024	PCS	Prepare for and participate in LPHS case team meeting regarding Rabo production of 34,000 pages worth of documents and next steps (0.8).	0.80	\$280.00
09/04/2024	WG	Continue extensive analysis of documents [REDACTED] (1.5); update the link with the excerpts (0.2); email to Mr. Jobe w [REDACTED] [REDACTED]	2.80	\$560.00
09/04/2024	FAF	Case strategy conference with Messrs. Dabdoub and Sode and Ms. Gillaspie regarding motion to compel strategy post-production of additional documents by Rabo; correspondence with Rabo's counsel regarding same.	0.90	\$315.00
09/04/2024	AD	Meeting with team regarding Rabo production.	1.00	\$450.00
09/05/2024	PCS	Prepare for and participate in case strategy call with Messrs. Dabdoub and Jobe regarding motion to compel hearing and related matters (1.6).	1.60	\$560.00
09/05/2024	WG	Prepare Rabo's document production on Disco platform (0.2); continue extensive analysis of documents pertaining to Friona (1.4).	1.60	\$320.00
09/05/2024	ADL	Correspondence with Mr. Sode regarding discovery; review documents in the Rabo production.	0.60	\$180.00
09/05/2024	FAF	Correspondence with eDiscovery team regarding Rabo's supplemental document production and logistics on same.	0.20	\$70.00
09/05/2024	AD	Telephone conference with Messrs. Jobe and Sode regarding hearing on motion to compel.	1.20	\$540.00
09/06/2024	PCS	Draft and revise witness and exhibit list in anticipation of motion to compel hearing, inclusive of exhibit collection and discussions with case team and co-counsel (3.3).	3.30	\$1,155.00
09/06/2024	MEC	Prepare binders for the judge and court reporter for upcoming hearing on our Motion to Compel.	1.20	\$240.00
09/06/2024	WG	Review Rabo's document production to determine organization structure to be used as a potential exhibit (0.3); confer with team regarding the same (0.3); prepare exhibits to accompany exhibit list (0.6); prepare all pertinent documents for mailing to court prior to upcoming hearing (0.5); revisions to the Exhibit List and exhibit preparation for the upcoming hearing on Trustee's Motion to Compel (1.0); confer with Mr. Jobe regarding exhibits (0.2).	2.90	\$580.00
09/06/2024	ADL	Correspondence with Messrs. Sode and Dabdoub and Ms. Gillaspie regarding discovery; review documents in the production from Rabo; confer with Mses. Lopez and Rastegar regarding	3.10	\$930.00

		Rabo's document production.		
09/06/2024	FAF	Correspondence with eDiscovery team regarding Rabo's supplemental document production and logistics on same; correspondence with Messrs. Dabdoub, Jobe, and Sode regarding upcoming hearing.	1.30	\$455.00
09/06/2024	AD	Attention to witness and exhibit lists for hearing on motion to compel Rabo discovery.	1.00	\$450.00
09/07/2024	WG	Review and respond to email from Mr. Jobe regarding new task.	0.10	\$20.00
09/08/2024	WG	Email to Mr. Jobe regarding the Exhibit List and exhibits (0.1); discuss the same with Mr. Dabdoub (0.2); revise exhibits and create additional Exhibit M (0.3); revise the Exhibit List and re-circulate to team (0.2); prepare and review the above for filing (0.4).	1.20	\$240.00
09/08/2024	AD	Review exhibits.	1.00	\$450.00
09/08/2024	AD	Finalize exhibit and witness lists.	1.00	\$450.00
09/08/2024	FAF	Review and finalize for filing Witness and Exhibit List for upcoming hearing.	0.70	\$245.00
09/09/2024	PCS	Analyze email correspondence between case team and co-counsel regarding hearing-related matters to synthesize key points for additional Surreply filing (0.2).  Prepare for and participate in case team meeting about division of labor for Surreply brief (0.5).  Analyze legal authorities relevant to arguments for discussion in Surreply (1.7).  Draft and revise Surreply in support of motion to compel (2.6).  Analyze legal auth [REDACTED] [REDACTED] (3.1).	8.10	\$2,835.00
09/09/2024	WG	Prepare two notebooks containing courtesy copies of pleadings and exhibits for the judge and court reporter per the rules (2.5); meeting with Mr. Sode and Mr. Fozouni regarding upcoming filing (0.3).	2.80	\$560.00
09/09/2024	ADL	Compare and record Bates number discrepancies in document lists; confer with Ms. Gillaspie regarding document compilation; correspondence with Ms. Gillaspie regarding discovery.	1.80	\$540.00
09/09/2024	AD	Attention to hearing preparation.	1.00	\$450.00
09/09/2024	FAF	Correspondence with Mr. Jobe regarding upcoming hearing strategy and additional Reply briefing on same; case strategy conference with Mr. Sode and Ms. Gillaspie regarding same.	1.40	\$490.00
09/10/2024	WG	In receipt of confirmation of court notebooks delivered to courthouse for hearing set for tomorrow (0.1);	0.20	\$40.00

		review and respond to email from Hudson Jobe regarding courtesy copies sent to the court (0.1).		
09/10/2024	AD	Attention to surreply brief.	0.80	\$360.00
09/10/2024	FAF	Correspondence and telephone conference with Mr. Dabdoub regarding Sur-Sureply; review correspondence with Rabo's counsel regarding conference on discovery dispute and Motion to Compel; review, revise, and conduct additional for Sur-Sureply.	3.20	\$1,120.00
09/11/2024	PCS	Analyze legal authorities pertinent to fact-intensive nature of work product doctrine for use during hearing on motion to compel (0.5).  Email correspondence with case team regarding next steps following hearing (0.3).	0.80	\$280.00
09/11/2024	AD	Attend hearing related to motion to compel Rabo.	3.50	\$1,575.00
09/11/2024	FAF	Correspondence with Messrs. Jobe and Ries regarding amending Reply Supplement; reviewing and finalizing revisions to same for filing; attend hearing on Motion to Compel by Webex; telephone conference with Mr. Jobe for post-hearing strategy on briefing; case strategy correspondence with Messrs. Dabdoub and Sode regarding same (No Charge).	3.50	\$0.00
09/12/2024	PCS	Draft and revise letter brief regarding privilege issues raised during September 11, 2024, motion to compel hearing, including analysis of new Fifth Circuit authority on privilege logs and other relevant legal materials (4.5).	4.50	\$1,575.00
09/12/2024	WG	Review Court notification pertaining to outcome of Hearing on September 11 and additional briefing due on Monday, add to the calendar.	0.20	\$40.00
09/12/2024	FAF	Correspondence with Mr. Jobe regarding hearing and post-hearing briefing strategy; case strategy conferences and correspondence with Messrs. Dabdoub and Sode regarding same.	1.10	\$385.00
09/13/2024	PCS	Substantive email correspondence with case team regarding letter brief on attorney signature issue and contemporaneous Rabo filing in connection with motion to compel (0.2).  Analyze legal authorities potentially relevant to issues discussed in letter brief (0.6).	0.80	\$280.00
09/13/2024	AD	Edit supplemental letter related to privilege.	0.50	\$225.00
09/13/2024	FAF	Research additional case law on proposition whether blanket assertion of overbreadth objection would obviate need for privilege log; case strategy correspondence with Messrs. Dabdoub and Sode regarding same; review and revise draft letter brief to Court; correspondence with Messrs. Jobe and Ries regarding same; review Rabo's Objection and Response to Reply Supplement.	2.90	\$1,015.00
09/15/2024	AD	Analysis of Rabo's objection and response.	0.80	\$360.00
09/15/2024	AD	Telephone conference with Mr. Jobe regarding supplemental letter	0.30	\$135.00

brief.					
09/15/2024	FAF	Correspondence with Mr. Jobe regarding post-hearing briefing strategy.	0.40	\$140.00	
09/16/2024	PCS	Analyze substantive email correspondence regarding issues for discussion in letter brief in support of motion to compel, inclusive of relevant legal authorities, and discuss same with case team (1.1).  Draft and revise letter brief in support of motion to compel by reviewing latest draft from Mr. Dabdoub and providing substantive feedback (0.4).	7.60	\$2,660.00	
		Begin analyzing consultant [REDACTED] [REDACTED] [REDACTED] (4.3).			
		Begin drafting and revising outline of [REDACTED] (1.8).			
09/16/2024	WG	Access share folder from Ray Behgam and maintain files in the case file (0.3); evaluate spreadsheet from Mr. Jobe and revise to include any missing invoices, combining files organized in order based on spreadsheet, perform extensive quality check for accuracy (4.1); email to Hudson Jobe and team forwarding revised spreadsheet and compiled invoices (0.2).	4.60	\$920.00	
09/16/2024	AD	Analysis of objection filed by Rabo to supplemental briefing.	0.80	\$360.00	
09/16/2024	AD	Telephone conference with Mr. Jobe regarding supplemental letter briefing.	0.20	\$90.00	
09/16/2024	AD	Finalize supplemental letter briefing.	3.00	\$1,350.00	
09/16/2024	FAF	Case strategy conference with Messrs. Dadboub and Sode regarding post-hearing briefing and next steps; review and finalize post-hearing letter brief; correspondence with Lain, Faulkner regarding review of CRI's work product; review draft in-process crib notes.	1.90	\$665.00	
09/17/2024	PCS	Finish drafting and revising outline of [REDACTED] (2.4).  Analyze legal authorities defining [REDACTED] (1.9).  Begin drafting and revising [REDACTED] (3.3).	7.60	\$2,660.00	
09/17/2024	WG	Complete evaluation of [REDACTED] extract identified invoices and structure in bates order, perform quality	2.90	\$580.00	

check to ensure accuracy (2.4); update link with the above document set (0.2); confer with Hudson Jobe regarding the above and about next steps (0.3).					
09/17/2024	ADL	Review correspondence from Mr. Jobe regarding discovery; correspondence with Ms. Gillaspie regarding discovery.	0.30	\$90.00	
09/17/2024	AD	Review materials received from Mr. Rae's office [REDACTED] [REDACTED]	0.30	\$135.00	
09/17/2024	AD	Status conference call with Mr. Ries and Mr. Jobe.	0.50	\$225.00	
09/17/2024	FAF	Case strategy correspondence with Messrs. Dabdoub and Sode regarding [REDACTED] [REDACTED]	0.50	\$175.00	
09/18/2024	PCS	Continue drafting and revising initial version of mediation demand letter to [REDACTED] [REDACTED] [REDACTED] (5.9).  Analyze documents relevant to instant issues for purpose of synthesizing support for assertions [REDACTED] (1.2).	7.10	\$2,485.00	
09/18/2024	WG	Review and respond to email from Hudson Jobe regarding next steps in the invoice evaluation process (0.2); meeting with Mr. Sode and Mr. Fozouni regarding case management (0.7).	0.90	\$180.00	
09/18/2024	FAF	Case strategy conference and correspondence with Messrs. Dabdoub and Sode, and Ms. Gillaspie regarding strategy of handling remaining deadlines and next steps.	1.00	\$350.00	
09/19/2024	PCS	Prepare for and participate [REDACTED] [REDACTED] [REDACTED] (1.3).  Draft and revise [REDACTED] [REDACTED] (1.6).  Analyze legal authorities pertinent [REDACTED] [REDACTED] (2.7).  Draft and revise [REDACTED] [REDACTED] (1.8).	7.40	\$2,590.00	
09/19/2024	WG	Attention to file maintenance (0.5); team meeting to discuss strategy and next steps (0.6); ensure internal deadlines are added to the calendar (0.1).	1.20	\$240.00	
09/19/2024	AD	Team meeting regarding investigation into causes of action against [REDACTED]	0.50	\$225.00	

09/19/2024	FAF	Case strategy conference with Messrs. Dabdoub and Sode and Ms. Gillaspie regarding action items and strategy on deliverables; review draft mediation demand letter to [REDACTED] review Petition in Intervention.	1.50	\$525.00
09/20/2024	WG	In receipt and review of email from Rabo's counsel forwarded by Mr. Jobe with updated files containing overlay of files, download files and respond confirming receipt.	0.30	\$60.00
09/20/2024	AD	Review Rabo and Focus's response to letter brief.	0.30	\$135.00
09/20/2024	FAF	Begin research on [REDACTED]	1.50	\$525.00
09/21/2024	FAF	Finalize research and analysis [REDACTED]	1.50	\$525.00
09/23/2024	PCS	Begin second review [REDACTED]	0.50	\$175.00
09/23/2024	WG	Determine data usage on Disco and identify pertinent documents (0.5); confer with Rick Cass regarding Lain Faulkner documents (0.3).	0.80	\$160.00
09/23/2024	FAF	Correspondence with Mr. Jobe regarding [REDACTED]	0.20	\$70.00
09/24/2024	PCS	Prepare for and participate in case team meeting with eDiscovery attorneys regarding review of initial Rabo production, inclusive of post-meeting email correspondence to give substantive guidance on search terms and other matters (1.6).  Finalize first draft [REDACTED] (2.6).	5.10	\$1,785.00
		Begin process of drafting and revising potential complaint [REDACTED]  [REDACTED] memorandum (0.9).		
09/24/2024	MAL	Attend team meeting regarding document review; attention to correspondence regarding same.	0.50	\$150.00
09/24/2024	KER	Meet with Mr. Sode and Mses. Gillaspie, Lawrence, and Lopez to discuss review of produced documents (0.4); meet with Mses. Lawrence and Lopez to discuss search terms for review of produced documents (0.1).	0.50	\$150.00
09/24/2024	WG	Prepare for and participate in meeting with review team regarding strategy for review of the most recent Rabo document production (0.8); review overlay of documents received from Rabo and prepare for ingest (0.4); analyze the overlay in comparison to the document families to ensure accuracy (0.7).	1.90	\$380.00

09/24/2024	AD	Email to Messrs. Ries and Jobe regarding update.	0.10	\$45.00
09/24/2024	ADL	Meet with Mses. Lopez, Rastegar and Gillaspie and Mr. Sode regarding document review; confer with Mses. Lopez and Rastegar regarding discovery; review and respond to correspondence from Mr. Sode regarding document review; correspondence with database vendor regarding key word search requests; call with database vendor regarding key word search; review key word search.	1.70	\$510.00
09/24/2024	FAF	Correspondence with eDiscovery team regarding scope of review and search parameters for same.	0.40	\$140.00
09/25/2024	PCS	Analyze claims analysis and known facts [REDACTED]  [REDACTED] (1.3).  Examine legal authorities relevant to potential claims against [REDACTED]  (1.7).  Begin drafting and revising preliminary adversary complaint against [REDACTED]  (1.5).  Analyze feedback from Mr. Dabdoub regarding draft [REDACTED]  [REDACTED] (0.8).	5.30	\$1,855.00
09/25/2024	WG	Analyze completed search term report ahead of review of the Rabo production (0.2); confirm correct entity of [REDACTED] (0.5).	0.70	\$140.00
09/25/2024	AD	Edit [REDACTED]	2.00	\$900.00
09/25/2024	FAF	Correspondence with eDiscovery team regarding scope of review and search parameters; case strategy correspondence with Messrs. Dabdoub and Sode and Ms. Gillaspie regarding [REDACTED]	0.50	\$175.00
09/26/2024	AD	Finalize draft settlement letter to [REDACTED]	1.00	\$450.00
09/26/2024	WG	Review and respond to emails from Rick Cass regarding Rabo document production (0.3); email to Hudson Jobe regarding Mr. Cass' request for the Rabo production and analyze subsequent emails between Mr. Jobe and Michael Johnson pertaining to Rabo documents (0.4); extensive analysis of [REDACTED] assemble key documents pertaining to search hits in categories B, C and F, extract identified documents and begin quality check to ensure accuracy of assembly and completion (5.7).	6.40	\$1,280.00
09/26/2024	ADL	Confer with Ms. Gillaspie regarding discovery.	0.20	\$60.00
09/26/2024	FAF	Review correspondence with Rabo's counsel regarding document production; case strategy correspondence with Messrs. Dabdoub	0.70	\$245.00

and Sode regarding sharing of privileged and work product materials with Lain Faulkner; correspondence with Messrs. Ries and Jobe regarding same.

09/27/2024	PCS	Analyze legal authorities circulated by Mr. Dabdoub regarding damages for purpose of synthesizing favorable damages framework (1.6).	3.50	\$1,225.00
		Independently a [REDACTED] [REDACTED] (0.7).		
		Draft and revise [REDACTED] (1.2)		
09/27/2024	WG	Complete quality check of key documents extracted from categories B, C and F to ensure accuracy, upload to share link (1.9); extensive analysis of categories A and D to extract documents not contained within the search hit parameter for Mr. Jobe's review, perform quality check of documents for accuracy, upload to share link upon completion (2.6); email to Mr. Jobe re-circulating share link providing update of completed review and extraction (0.2).	4.70	\$940.00
09/29/2024	FAF	Correspondence with Messrs. Ries and Jobe [REDACTED] [REDACTED]	0.10	\$35.00
09/29/2024	AD	Further edits to [REDACTED]	0.80	\$360.00
09/29/2024	AD	Email to Mr. Ries [REDACTED]	0.10	\$45.00
09/30/2024	PCS	Draft and revise existing sections of [REDACTED] complaint by editing throughout (1.7).	7.40	\$2,590.00
		Draft and revise causes of action in potential [REDACTED] [REDACTED] [REDACTED] (2.9).		
		Analyze legal authorities illustrating [REDACTED] [REDACTED] (1.3).		
		Analyze facts of case and legal authorities to identify potential legal theories for p [REDACTED] [REDACTED] (1.5).		
09/30/2024	MAL	Review background materials for document review; review documents for issues.	1.80	\$540.00
09/30/2024	WG	Download Rabo's Friday production, maintain in case file (0.8); attention to emails regarding privileged documents (0.2); revise case file to remove previous production (0.2); download Rabo's supplemental document production, maintain in case file (1.0).	2.20	\$440.00

09/30/2024	ADL	Database administration to create review stages for document review; confer with Ms. Lopez regarding document review; review and tag documents produced by Rabobank.	2.90	\$870.00
09/30/2024	FAF	Correspondence with Messrs. Ries and Jobe regarding mediation demand letter [REDACTED]	0.10	\$35.00
<b>Services Subtotal</b>			<b>\$56,515.00</b>	

### Expenses

Date	Description	Quantity	Price	Total
09/12/2024	FedEx to U.S. Bankruptcy Court Lubbock, TX 09/09/24.	1.00	\$49.76	\$49.76
<b>Expenses Subtotal</b>			<b>\$49.76</b>	

Time Keeper	Position	Hours	Rate	Total
Alan Dabdoub	Partner	22.1	\$450.00	\$9,945.00
Farsheed Fozouni	Associate	22.0	\$350.00	\$7,700.00
Farsheed Fozouni	Associate	3.5	\$0.00	\$0.00
A'Lys Lawrence	Attorney	14.6	\$300.00	\$4,380.00
Melissa Lopez	Associate	2.3	\$300.00	\$690.00
Katie Rastegar	Associate	0.5	\$300.00	\$150.00
Campbell Sode	Associate	71.4	\$350.00	\$24,990.00
Mariela Cawthon	Paralegal	1.2	\$200.00	\$240.00
Whitney Gillaspie	Paralegal	42.1	\$200.00	\$8,420.00
<b>Subtotal</b>			<b>\$56,564.76</b>	
<b>Total</b>			<b">\$56,564.76</b">	

### Detailed Statement of Account

#### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
20243162	09/19/2024	\$16,822.92	\$0.00	\$16,822.92
20243592	10/19/2024	\$69,984.40	\$0.00	\$69,984.40

**Current Invoice**

<b>Invoice Number</b>	<b>Due On</b>	<b>Amount Due</b>	<b>Payments Received</b>	<b>Balance Due</b>
20244063	11/14/2024	\$56,564.76	\$0.00	\$56,564.76
<b>Outstanding Balance</b>				<b>\$143,372.08</b>
<b>Total Amount Outstanding</b>				<b>\$143,372.08</b>

Please make all amounts payable to: LYNN PINKER HURST & SCHWEGMANN, L.L.P.  
Tax ID 75-2507536

Please pay within 30 days.

LYNN  
PINKER  
HURST &  
SCHWEGMANN

## LYNN PINKER HURST & SCHWEGMANN, L.L.P.

2100 Ross Avenue, Suite 2700  
Dallas, Texas 75201  
Phone: 214.981.3800  
www.lynnlp.com

Invoice # 20244623  
Date: 11/15/2024  
Due On: 12/15/2024

Kent Ries  
Law Office of Kent Ries  
P.O. Box 3100  
Austin, TX 79116

### (5707-00001) Ries: In Re McClain Farms, Inc.; In Re McClain Feed Yard, Inc.; and In Re 7M Cattle Feeders, Inc.

#### In Re McClain Farms, Inc.; In Re McClain Feed Yard, Inc.; and In Re 7M Cattle Feeders, Inc.

Client Reference Number:

#### Services

Date	TK	Description	Hours	Total
10/01/2024	WG	Review search term report of the Rabo Production (0.6); review status update from Ms. Lawrence regarding hits on specific search terms and phrases, assemble the documents for each set (1.2).	1.80	\$360.00
10/01/2024	PCS	Analyze legal authorities [REDACTED] (3.6).  Analyze legal authorities setting [REDACTED] (2.5).  Draft and revise aiding and abetting [REDACTED] (1.2).  Draft and revise remainder [REDACTED]		

		(1.6).		
10/01/2024	KER	Review of case pleadings and document review protocol (1.0); review of produced documents for relevance and importance (3.0).	4.00	\$1,200.00
10/01/2024	ADL	Database administration to update review stages for document review; confer with Ms. Lopez regarding document review; review and tag documents produced by Rabobank; correspondence with Mr. Sode regarding document review.	3.20	\$960.00
10/01/2024	MAL	Confer with Ms. Lawrence and Ms. Rastegar regarding document review; review documents for issues.	1.80	\$540.00
10/01/2024	AD	Exchange emails with Mr. Ries [REDACTED]	0.20	\$90.00
10/01/2024	AD	Email to Mr. Rae [REDACTED]	0.10	\$45.00
10/02/2024	PCS	Analyze initial set of ~450 Rabo-produced documents flagged by eDiscovery team for purpose of providing feedback on search terms, tagging, and other relevant matters.	3.90	\$1,365.00
10/02/2024	MAL	Review documents for issues.	4.90	\$1,470.00
10/02/2024	ADL	Database administration to create new document review stage; review and respond to correspondence from Mr. Sode; review Mr. Sode's document selections; confer with Mses. Lopez and Rastegar regarding document review; review and tag Rabobank documents; attention to correspondence from Ms. Gillaspie regarding discovery.	6.10	\$1,830.00
10/02/2024	KER	Review of produced documents for issue tagging and importance.	5.00	\$1,500.00
10/02/2024	AD	Review Mr. Jobe's comments to demand letter [REDACTED]	0.20	\$90.00
10/02/2024	AD	Telephone conference with Messrs. Ries, Jobe and Rae regarding [REDACTED]	1.50	\$675.00
10/02/2024	AD	Exchange emails with Mr. Jobe [REDACTED]	0.20	\$90.00
10/02/2024	WG	In receipt of Trustee's interim report for the period ending 10-02-2024, maintain in case file.	0.10	\$20.00
10/03/2024	PCS	Prepare for and participate in case team meeting with Mr. Dabdoub regarding ingest of second Rabo production and prudence of requesting supplemental privilege log from Rabo counsel following clawback of documents from second production (0.4).  Email correspondence with case team regarding ingest of second Rabo production following re-production by Rabo counsel (0.3).	1.90	\$665.00
		Email correspondence with Rabo counsel regarding supplemental privilege log (0.3).		
		Draft and revise initial version of Mechanics Bank complaint to incorporate additional facts and legal authorities throughout (0.9).		
10/03/2024	WG	Confer with Lino Gonzales regarding hosting data (0.2);	0.80	\$160.00

		prepare and forward link to Pinnacle for ingest of Rabo's Second Supplemental Document Production (0.4); prepare files on Disco for review (0.2).		
10/03/2024	KER	Review of produced documents for issue tagging and importance.	3.50	\$1,050.00
10/03/2024	MAL	Review documents for issues.	0.80	\$240.00
10/03/2024	AD	Meeting with Mr. Sode regarding demand letter.	0.20	\$90.00
10/04/2024	PCS	Incorporate notes from October 4, 2024, conference call between LPHS case [REDACTED] [REDACTED] (3.7).  Draft and revise initial Mechanics Bank complaint throughout to incorporate additional or superior legal authorities, circulate same to LPHS case team (2.0).	5.70	\$1,995.00
10/04/2024	MAL	Review documents for issues.	2.90	\$870.00
10/04/2024	KER	Review of produced documents for issue tagging and importance.	4.00	\$1,200.00
10/04/2024	ADL	Review and respond to correspondence from Mr. Sode regarding document review; correspondence to Ms. Gillaspie regarding document production; review document productions.	0.60	\$180.00
10/05/2024	MAL	Review documents for issues.	1.50	\$450.00
10/05/2024	KER	Review of produced documents for issue tagging and importance.	1.50	\$450.00
10/06/2024	ADL	Review and issue tag Rabobank documents.	2.80	\$840.00
10/06/2024	KER	Review of produced documents for issue tagging and importance.	2.10	\$630.00
10/06/2024	AD	Edit demand letter [REDACTED]	1.50	\$675.00
10/07/2024	PCS	Prepare for and participate in case team meeting regarding review of [REDACTED] [REDACTED] (0.7).  Review and analyze initial draft of [REDACTED]   (1.1).  Substantive email correspondence with eDiscovery and case team regarding [REDACTED] (0.9).  Analyze key and hot documents flagged by eDiscovery team while reviewing second Rabo production (0.8).  Analyze documents [REDACTED] document categories for emphasis by eDiscovery team in forthcoming review (4.1).	7.60	\$2,660.00
10/07/2024	WG	Discussion with Mr. Dabdoub and Mr. Sode to establish game plan for review [REDACTED] 2); attention to emails with review team regarding the above and	1.80	\$360.00

provide input where needed (0.3);  
 case assessment to determine data hosting fee [REDACTED] (0.5);  
 attention to internal emails regarding hot documents for case development, maintain identified hot documents in case file for future reference (0.4);  
 review email from Ms. Lawrence regarding review completion of Rabo's second document production, maintain all documents identified as hot in the case file (0.4).

10/07/2024	KER	Review of produced documents for issue tagging and importance.	2.00	\$600.00
10/07/2024	ADL	Review and respond to correspondence from Mr. Sode regarding document review; review and issue tag Rabo documents; write an analysis of hot Rabo documents; confer with Mses. Rastegar and Lopez regarding document review schedule.	5.20	\$1,560.00
10/07/2024	AD	Telephone conference with Mr. Jobe [REDACTED]	0.20	\$90.00
10/07/2024	AD	Analysis of [REDACTED] production.	0.50	\$225.00
10/08/2024	WG	Prepare link with all [REDACTED] es, perform quality check to ensure all files successfully uploaded to link prior to ingest (1.4); email to Pinnacle regarding ingest of the above (0.1); perform quality check of ingested [REDACTED] Disco and provide status update to team (0.8); review letter received from Rabo's counsel, add deadline provided by Rabo's counsel to the calendar (0.2); file maintenance of Rabo production and discovery responses from 2B Farms (0.3).	2.80	\$560.00
10/08/2024	MAL	Attention to correspondence regarding document review; confer with Ms. Lawrence regarding same.	0.20	\$60.00
10/08/2024	KER	Review of produced documents for issue tagging and importance.	1.20	\$360.00
10/08/2024	ADL	Review and respond to correspondence from Mr. Sode regarding document review; review and issue tag Rabo documents; confer with Mses. Rastegar and Lopez regarding document review; review and respond to correspondence from Ms. Gillaspie regarding discovery.	3.50	\$1,050.00
10/09/2024	MAL	Confer with Ms. Lawrence and Ms. Rastegar regarding document review.	0.20	\$60.00
10/09/2024	PCS	Email correspondence with case and eDiscovery teams regarding review of [REDACTED] partnership agreements and other like documents.	0.60	\$210.00
10/09/2024	KER	Review of produced documents for issue tagging and importance (2.0); confer with Mses. Lawrence and Lopez regarding status of review of produced documents (0.3).	2.30	\$690.00
10/09/2024	ADL	Database administration to create document review stage for [REDACTED] review and respond to correspondence from Mr. Sode regarding document search request; confer with Mses. Lopez and Rastegar regarding	6.20	\$1,860.00

		discovery; correspondence with database vendor regarding search term report; review and edit search term report.		
10/10/2024	WG	Review and respond to emails from review team regarding contents of the ingest on to Disco titled Initial Documents, analyze Outline of Master Index to gather requested information, determine custodian and respond accordingly.	0.90	\$180.00
10/10/2024	ADL	Review and issue [REDACTED] ch for partnership agreement documents; correspondence with Ms. Gillaspie regarding discovery; confer with Mses. Lopez and Rastegar regarding discovery; database administration to update document review stage.	6.50	\$1,950.00
10/11/2024	PCS	Draft and revise [REDACTED] by adding citations to [REDACTED] and documents, email correspondence with Mr. Dabdoub regarding same (1.2).  Analyze accounting standards in connection with requirements for statement of cash flows; email correspondence with case team regarding same (0.7).	1.90	\$665.00
10/11/2024	ADL	Confer with Ms. Lopez regarding document review; review and issue tag CRI documents.	4.10	\$1,230.00
10/13/2024	ADL	Review and issue tag CRI documents.	2.20	\$660.00
10/14/2024	ADL	Database administration to update document review stage; review and issue tag CRI documents.	7.10	\$2,130.00
10/15/2024	PCS	Case team meeting with Mr. Fozouni to analyze pending in projects and determine allocation of bandwidth; substantive email correspondence with case team regarding same.	0.60	\$210.00
10/15/2024	WG	Review emails and notes from Jason Rae.	0.20	\$40.00
10/15/2024	ADL	Correspondence with Mr. Sode regarding document review findings; review and [REDACTED] documents.	2.60	\$780.00
10/15/2024	FAF	Case strategy conference with Mr. Sode regarding next steps and finalization of various tasks; correspondence and review of summary analysis of eDiscovery team [REDACTED]	0.50	\$175.00
10/15/2024	AD	Telephone conference with Mr. Ries regarding [REDACTED] [REDACTED]	1.00	\$450.00
10/16/2024	PCS	Email correspondence with case team reg [REDACTED] [REDACTED] (0.2).  Analyze eDiscovery team findings from [REDACTED] production with view toward supplementation of draft demand letter (1.9).  Draft and revise [REDACTED] letter to reflect new findings from eDiscovery team (1.4).  Substantive email correspondence with external case team regarding finishing touches [REDACTED]	4.10	\$1,435.00

(0.6).

10/16/2024	ADL	Review and respond to correspondence from Mr. Sode regarding discovery; review and tag [REDACTED]	2.70	\$810.00
10/16/2024	WG	Attention to and review of document review performed pertaining to [REDACTED] and the search term reports related to pertinent documents.	0.40	\$80.00
10/16/2024	FAF	Correspondence with eDiscovery team regarding [REDACTED] review; correspondence with Lain Faulkner team regarding [REDACTED] demand letter.	0.60	\$210.00
10/16/2024	AD	Attention to [REDACTED]	0.50	\$225.00
10/17/2024	ADL	Review and tag [REDACTED]	2.30	\$690.00
10/17/2024	FAF	Begin reviewing and revising Mechanics Bank complaint as well as researching additional possible contractual causes of action. [REDACTED]	1.50	\$525.00
10/18/2024	PCS	Substantive mail correspondence with case team regarding demand letter to [REDACTED] specifically transmittal to [REDACTED] (0.6).  Draft and revise demand letter to [REDACTED] to incorporate findings from eDiscovery team and feedback from Mr. Dabdoub (2.3).  Substantive discussion with Mr. Fozouni regarding draft [REDACTED]  [REDACTED] (0.9).	3.80	\$1,330.00
10/18/2024	ADL	Review correspondence from Messrs. Dabdoub and Sode; confer with Ms. Lopez regarding discovery; review and tag [REDACTED] documents.	0.50	\$150.00
10/18/2024	FAF	Continue reviewing and revising [REDACTED] [REDACTED] correspondence with Mr. Rae regarding same.	3.10	\$1,085.00
10/18/2024	AD	Finalize demand letter to [REDACTED]	1.00	\$450.00
10/18/2024	AD	Exchange emails with Mr. Jobe rega [REDACTED]	0.10	\$45.00
10/20/2024	ADL	Review and tag [REDACTED] documents.	0.80	\$240.00
10/20/2024	WG	Review final mediation demand letter to [REDACTED] add response deadline to calendar.	0.20	\$40.00
10/21/2024	ADL	Review, annotate and tag [REDACTED] documents.	5.80	\$1,740.00
10/22/2024	ADL	Review and tag [REDACTED] documents.	3.30	\$990.00
10/22/2024	AD	Telephone conference with Mr. Rae regarding demand letter to [REDACTED]	0.10	\$45.00

10/23/2024	KER	Confer with Mses. Lawrence and Lopez regarding review of produced documents.	0.20	\$60.00
10/23/2024	MAL	Confer with Ms. Lawrence and Ms. Rastegar regarding document review.	0.10	\$30.00
10/23/2024	ADL	Confer with Mses. Lopez and Rastegar regarding document review; review and tag [REDACTED] correspondence with Mr. Sode regarding document review.	5.10	\$1,530.00
10/24/2024	ADL	Correspondence to Mr. Sode and team with [REDACTED] document review findings; review and tag CRI documents; confer with Mr. Tahir regarding upcoming Rabo document review.	4.00	\$1,200.00
10/24/2024	AD	Telephone conference with Messrs. Jobe and Rae regarding status.	1.00	\$450.00
10/25/2024	ADL	Write correspondence with document review instructions to Mr. Tahir; review [REDACTED] Rabo documents.	1.70	\$510.00
10/27/2024	AD	Telephone conference with Mr. Jobe regarding status.	0.50	\$225.00
10/28/2024	PCS	Analyze substantive eDiscovery team notes on remaining [REDACTED] [REDACTED] inclusive of reviewing documents marked further review and documents tagged HOT; related email correspondence with case team regarding next steps.	3.30	\$1,155.00
10/28/2024	MAL	Confer with Ms. Lawrence and Ms. Rastegar regarding document review.	0.10	\$30.00
10/28/2024	WG	Assemble and maintain all hot documents from the [REDACTED] [REDACTED] case file and review (0.8); archive all [REDACTED] (0.3).	1.10	\$220.00
10/28/2024	ADL	Correspondence with Ms. Gillaspie and Mr. Sode regarding document archival; confer with Ms. Lopez regarding document archival; export document tagging information.	0.30	\$90.00
10/28/2024	IAT	Review/analyze document review protocol.	1.50	\$562.50
10/29/2024	WG	Review document 37 Order Granting Motion to Compel regarding discovery, add deadlines listed in order to the calendar.	0.30	\$60.00
10/29/2024	AD	Review Order on Motion to Compel and email regarding same to Mr. Jobe.	0.20	\$90.00
10/29/2024	ADL	Review Rabo bank documents and tag for issues and hot documents.	3.60	\$1,080.00
10/29/2024	FAF	Review Court's Order on Motion to Compel.	0.20	\$70.00
<b>Services Subtotal</b>			<b>\$59,112.50</b>	

### Expenses

Date	Description	Quantity	Price	Total
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10/31/0024	DISCO DATA HOSTING.		1.00	\$555.94	\$555.94
09/30/2024	Disco Data Hosting		1.00	\$1,111.88	\$1,111.88
09/30/2024	In-house copy charges		40.00	\$0.10	\$4.00
<b>Expenses Subtotal</b>					<b>\$1,671.82</b>

Time Keeper	Position	Hours	Rate	Total
Alan Dabdoub	Partner	9.0	\$450.00	\$4,050.00
Farsheed Fozouni	Associate	5.9	\$350.00	\$2,065.00
A'Lys Lawrence	Attorney	80.2	\$300.00	\$24,060.00
Melissa Lopez	Associate	12.5	\$300.00	\$3,750.00
Katie Rastegar	Associate	25.8	\$300.00	\$7,740.00
Campbell Sode	Associate	42.3	\$350.00	\$14,805.00
Imran Tahir	Attorney	1.5	\$375.00	\$562.50
Whitney Gillaspie	Paralegal	10.4	\$200.00	\$2,080.00
<b>Subtotal</b>				<b>\$60,784.32</b>
<b>Total</b>				<b>\$60,784.32</b>

## Detailed Statement of Account

### Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
20243162	09/19/2024	\$16,822.92	\$0.00	\$16,822.92
20243592	10/19/2024	\$69,984.40	\$0.00	\$69,984.40
20244063	11/14/2024	\$56,564.76	\$0.00	\$56,564.76

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
20244623	12/15/2024	\$60,784.32	\$0.00	\$60,784.32
<b>Outstanding Balance</b>				<b>\$204,156.40</b>
<b>Total Amount Outstanding</b>				<b>\$204,156.40</b>

Please make all amounts payable to: LYNN PINKER HURST & SCHWEGMANN, L.L.P.  
Tax ID 75-2507536

Please pay within 30 days.